

# **EXHIBIT A**

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**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Christina Joy F. Grese**  
Associate  
215.963.5085

April 8, 2008

**VIA FIRST CLASS MAIL AND E-MAIL**

Jeremy M. Cerutti, Esquire  
Karpf, Karpf & Virant  
3070 Bristol Pike  
Bldg. 2, Ste. 231  
Bensalem, PA 19020

Re: Sills v. Educational Commission for Foreign Medical Graduates, C.A. No. 2:07-cv-04637

Dear Mr. Cerutti:

I write regarding Plaintiff's overdue responses to Defendant's First Set of Interrogatories and Defendant's First Request for Production of Documents in the above-referenced action. The purpose of this letter is to address these issues in an attempt to resolve them without involvement of the Court.

As you know, Defendant's discovery requests were served by regular mail and e-mail on February 11, 2008. Accordingly, Plaintiff's responses were due on March 17, 2008. I have since telephoned you and left messages regarding Plaintiff's responses, which are now three (3) weeks overdue. To date, I have received neither Plaintiff's responses nor any communication seeking an extension for such responses. We therefore request that you provide us with Plaintiff's responses immediately. If we do not receive Plaintiff's discovery responses within the next week, we will be forced to submit a motion to compel discovery. If such a motion is required, we will also seek reasonable expenses incurred in making the motion, including attorney's fees.

Very truly yours,



Christina Joy F. Grese

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

Jeremy M. Cerutti, Esquire  
April 8, 2008  
Page 2

c:     Ari R. Karpf, Esquire  
       Michael J. Ossip, Esquire

# **EXHIBIT B**



akarpf@karpf-law.com

04/10/2008 07:31 PM

To jgrese@morganlewis.com

cc

bcc

Subject RE: Sills v. ECFMG

History:  This message has been forwarded.

Joy,

Sorry about the delay in providing discovery responses in the above matter. We expect our client to drop off the rest of his responsive documents tomorrow to our office. We also anticipate Mr. Sills signing the verification for his Interrogatory Responses by tomorrow at the latest. We anticipate providing discovery responses to you by early next week at the latest.

Again, sorry for the delay.

Very truly yours,

Ari R. Karpf, Esq.

Karpf, Karpf & Virant  
Neshaminy Plaza  
3070 Bristol Pike  
Bldg. 2, Ste. 231  
Bensalem, PA 19020  
215-639-0801 (P)  
215-639-4970 (F)

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\* \* \* \*

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----- Original Message -----

Subject: Sills v. ECFMG

From: [jgrese@morganlewis.com](mailto:jgrese@morganlewis.com)  
Date: Tue, April 08, 2008 6:30 pm  
To: "Jeremy Cerutti" <[jeremy@karpf-law.com](mailto:jeremy@karpf-law.com)>  
Cc: [akarpf@karpf-law.com](mailto:akarpf@karpf-law.com), [mossip@morganlewis.com](mailto:mossip@morganlewis.com)

Jeremy:

Please see the attached correspondence regarding Plaintiff's discovery responses.

Thanks,

Joy

Joy F. Grese  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103  
215.963.5085  
Fax: 215.963.5001 or 1.877.432.9652  
[jgrese@morganlewis.com](mailto:jgrese@morganlewis.com)

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# EXHIBIT C



"Kristin Sutherland"  
<kristin@karpf-law.com>

04/18/2008 11:14 AM

To jgrese@morganlewis.com

cc

bcc

Subject Sillis v. Educational Commission for Foreign Medical  
Graduates

Dear Ms. Grese,

I am currently trying to obtain a verification from our client so that I may forward his responses. I will try to have these faxed over by the end of the day. If you have any questions please feel free to contact me or Ari.

Thank you.

Very truly yours,

Kristin Sutherland  
Paralegal

Karpf, Karpf, & Virant  
3070 Bristol Pike  
Building 2, Suite 231  
Bensalem, PA 19020  
Phone: (215) 639-0801 Ext. 108  
Fax: (215) 639-4970




# **EXHIBIT D**



akarpf@karpf-law.com  
04/22/2008 08:34 AM

To jgrese@morganlewis.com  
cc mossip@morganlewis.com, "Jeremy Cerutti"  
<jeremy@karpf-law.com>  
bcc

Subject RE: Sills v. ECFMG

History:  This message has been replied to.

Joy,

Thank you for your patience with respect to the above case. If Mr. Sills does not contact appear in our Firm by close of business today to authorize this Firm to send his discovery responses, we will promptly file a motion to withdraw from his case this evening.

Very truly yours,

Ari R. Karpf, Esq.

Karpf, Karpf & Virant  
Neshaminy Plaza  
3070 Bristol Pike  
Bldg. 2, Ste. 231  
Bensalem, PA 19020  
215-639-0801 (P)  
215-639-4970 (F)

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# **EXHIBIT E**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,

Plaintiff,

V.

EDUCATIONAL COMMISSION FOR  
FOREIGN MEDICAL GRADUATES,

Defendant.

Civil Action No. 07-4637

**PETITION OF PLAINTIFF'S COUNSEL TO WITHDRAW**

Plaintiff's undersigned counsel respectfully requests that they be permitted to withdraw from the above-captioned matter for the following reasons:

1. The instant lawsuit was initiated on November 5, 2007 (docket entry # 1).
2. In the instant lawsuit, Plaintiff seeks redress for alleged violations of the Family and Medical Leave Act.
3. A Rule-16 conference was conducted on February 15, 2008 wherein this Court set a fact discovery deadline for June 6, 2008 (docket entry # 9).
4. For a period of more than 2 months, Plaintiff has failed to cooperate with his counsel by refusing to communicate with counsel and by failing to appear at scheduled appointments.
5. Plaintiff has been warned in writing and by telephone message multiple times that his failure to cooperate would result in Plaintiff's undersigned counsel being forced to seek the instant relief.
6. Under the Rules of Professional Conduct 1.16(b)(5), 1.16(b)(6), and 1.16(b)(7), Plaintiff's undersigned counsel should be permitted to withdraw from the instant case.

**KARPF, KARPF & VIRANT**

By: 

Ari R. Karpf, Esq.

Sean Galvin, Esq.

Attorneys for Plaintiff

3070 Bristol Pike

Building 2, Suite 231

Bensalem, PA 19020

(215) 639-0801 phone

(215) 639-4970 fax

Date: April 23, 2008

# **EXHIBIT F**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 07-4637
	:	
v.	:	
	:	
EDUCATIONAL COMMISSION FOR	:	
FOREIGN MEDICAL GRADUATES,	:	
	:	
Defendants.	:	

**ORDER**

AND NOW, this 13th day of May, 2008, it is hereby ORDERED that Plaintiff Ryan Sills shall SHOW CAUSE at a hearing on June 2, 2008, at 4:00 p.m. in Courtroom 17A, United States Courthouse, why the Petition of his counsel, Ari Karpf and Sean Galvin and the firm of Karpf, Karpf & Virant, for Leave to Withdraw as Legal Counsel (Docket No. 10) should not be granted. It is FURTHER ORDERED that Plaintiff's counsel shall serve the Plaintiff with a copy of this Order via U.S. Mail.

BY THE COURT:

S/ James T. Giles

J.

# EXHIBIT G



JG

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,

Plaintiff,

Civil Action No. 07-4637

EDUCATIONAL COMMISSION FOR  
FOREIGN MEDICAL GRADUATES,

Defendant.

FILED

MICHAEL E. KULTZ, Clerk  
By JL Dep. Clerk

ORDER

AND NOW, this 2nd day of June, 2008, that upon consideration of Plaintiff's Counsels' Petition to Withdraw their Appearance and any response thereto, it is hereby **ORDERED** and **DECREED** the Petition is GRANTED, and the Firm of Karpf, Karpf & Virant and attorneys Ari Karpf and Sean Galvin are no longer counsel for Plaintiff.

It is further ORDERED that the above-captioned matter is stayed for a period of <sup>thirty</sup>~~sixty~~ (30) days to permit Plaintiff to find new counsel if he wishes to proceed with his case. The trial date of 12/3/08 remains firm.

BY THE COURT

James T. Giles  
The Honorable James T. Giles, U.S.D.J.

ENTERED

CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN SILLS,	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 07-4637
	:	
v.	:	
	:	
EDUCATIONAL COMMISSION FOR	:	
FOREIGN MEDICAL GRADUATES,	:	
	:	
Defendants.	:	

**ORDER**

AND NOW, this 2<sup>nd</sup> day of June, 2008, the court having granted the Petition of Ari Karpf and the firm of Karpf, Karpf & Virant for Leave to Withdraw as Legal Counsel, it is hereby ORDERED as follows:

1. All previously scheduled dates in the above-captioned matter are STAYED for a period of 30 days, except that the trial and final pretrial conference dates are unchanged.
2. If, for good cause, Plaintiff files a motion to extend the discovery deadline, the court will consider expanding the date to a date not later than August 31, 2008.
3. Plaintiff will be deemed pro se if he fails to obtain an attorney within thirty (30) days.
4. Attorney Jeremy Cerutti of the law firm Karpf, Karpf & Virant, shall send to Plaintiff via regular and certified mail a copy of (1) the instant Order and (2) the court's Order granting the Petition of Ari Karpf and the firm of Karpf, Karpf & Virant for Leave to Withdraw as Legal Counsel.

5. The court shall take under advisement Defendant's Oral Motion to Dismiss for Lack of Prosecution, as made on the record on this date.

BY THE COURT:

S/ James T. Giles

J.